

Subject: ETAAC Discussion Draft, version 12.21.07

From: Jon Slangerup <js@clearedgepower.com>

Date: Tue, 05 Feb 2008 19:26:06 -0800

To: schurch@arb.ca.gov

CC: bob@bobepstein.to, Bill Sproull <bsproull@Clearedgepower.com>

Steve,

Unfortunately, I will be traveling next Monday and will not be able to attend the ETAAC meeting in Sacramento. Therefore, I am submitting the following comments and recommended changes and additions to the ETAAC Discussion Draft, based on version 12.21.07, which is the latest version that I have.

Here are my suggestions (actual changes/additions highlighted in **bold** type):

- Section 4, Introduction, Page 4-1 (page 78/278): There is almost no mention of residential buildings as a significant contributor to GHG emissions. Recommend the addition of a paragraph in the Introduction with wording similar to the following:

"Another significant source of GHG emissions are the State's residential buildings. There are more than 12 million residential units in the State, representing about 8% of the State's electricity usage and related GHG emissions. With the emergence of solar, micro CHP, small wind and other self generation and energy efficiency technologies, such technologies have the potential to reduce GHG emissions from residential electricity usage by more than 50%. The EU (led by UK), Japan and Korea are countries aggressively promoting the use of these technologies. Likewise, the State has implemented a number of programs, such as SGIP and CSI, to promote the use of these self-generation clean energy technologies."

- Section 4, Page 4-5 (page 81/278), 2nd paragraph, 2nd sentence: Recommend changing wording from "...small- and large scale CHP..." to "...**micro to** large scale CHP..."
- Section 4, Page 4-9 (page 85/278), 4th bullet "Possible Solution:" Recommend changing wording from "Encourage CHP..." to "Encourage **micro to large scale** CHP systems..."
- Appendix IV, Page 9-60 (page 220/278), 2nd paragraph, last line: Recommended change to "GHG emissions by as much as **25-45** percent." (Change to be consistent with 25-45% GHG reduction reference found on Page 4-4 (page 80/278) under the bullet "GHG Reduction Potential."
- Appendix VI, Page 9-105 (page 265/278), Line 88: Recommended change to "**Jon** Slangerup."

Thanks in advance for your consideration of these suggested changes.

Best regards, Jon

Jon W. Slangerup

President and CEO

ClearEdge Power Corp.